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Attorneys for Plaintiffs
SANRIO COMPANY, LTD. and SANRIO, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SANRIO COMPANY, LTD., a Japanese
corporation and SANRIO, INC., a California
corporation,

Plaintiffs,

vs.

J.I.K. Accessories, Inc., Accessitive
Accessories, Inc., B.B. Apparels Inc., Amuseco
Accessories, Inc., Nana Accessory, Inc., Seanna
Corporation, Heiress Enterprises, Inc., Pinkland
Corporation, Inc., Bliss, Final Choice, Joon Sik
Bae, Yong Woo Kim, Any Bae, Jason Bae,
Brian Ban, Ryan Bae, Ho Yong Na, Sang Wha
Kim, Aeran Bae a/k/a Chris Bae, Jenny J. Lee,
Sukmin Bae, John Bae, Lisa Bae, Grace Kim,
Ken Chung, Yeun Sik Cha, Debbie Kim, DOES
1- 10,

Defendants

Civil Action No. C 09-00440 MHP

STIPULATION TO EXTEND
DISCOVERY DEADLINES;
~~[PROPOSED]~~ ORDER

Counsel for plaintiffs Sanrio Company, Ltd. and Sanrio, Inc. ("Plaintiffs") and
defendants that currently remain in the case respectfully submit this stipulation requesting an
extension of time for discovery and other dates as follows.

1 WHEREAS, the current trial date is in August 2011 and none of the changes in
2 deadlines set forth herein will impact that date;

3 WHEREAS, the undersigned parties participated in mediation on August 25, 2010;

4 WHEREAS, during the mediation, Plaintiffs' claims against four defendants were
5 settled (namely, Sukmin Bae, Lisa Bae a/k/a/ Hyang Hee Bae, and their two unincorporated
6 businesses called "Bliss" and "Final Choice") (the "Sukmin Bae Defendants").

7 Documentation of that settlement is in progress and the appropriate documents will be filed
8 with the Court in due course;

9 WHEREAS, Plaintiffs and defendants J.I.K Accessories, Inc., Accessitive
10 Accessories, Inc., B.B. Apparels Inc., Amuseco Accessories, Inc., Joon Sik Bae a/k/a/ Jason
11 Bae, Andy Bae, and Brian Bae) (collectively, the "Joon Sik Bae Defendants") made progress
12 during the mediation and have agreed to continue negotiations and to engage in further
13 mediation, if necessary, in good faith efforts to reach settlement;

14 WHEREAS, Defendants John Bae, Aeran Bae a/k/a Chris Bae, and their two
15 unincorporated businesses called "Bliss" and "Final Choice" (collectively, the "John Bae
16 Defendants") are newly involved in the action (by stipulated order dated August 24, 2010, the
17 entry of default filed against them on December 2, 2010 was set aside, and the John Bae
18 Defendants filed their Answer on or about September 3, 2010;

19 WHEREAS, the current deadline to complete fact discovery is October 15, 2010;

20 WHEREAS, on July 15, 2010, Plaintiffs, the Sukmin Bae Defendants and the Joon Sik
21 Bae Defendants filed one prior stipulation and request to extend discovery dates, under which
22 the parties agreed that any formal discovery served prior to the mediation date shall be stayed,
23 and deemed served on the day after the final date that mediation is completed;

24 WHEREAS, counsel for all of the parties agree that extending the discovery deadlines as
25 requested herein would increase the likelihood of a successful settlement because the parties would
26 not need to expend additional resources for discovery while settlement negotiations are ongoing;

1 WHEREAS, counsel for all of the parties request that discovery and dispositive motion
2 deadlines be extended accordingly;

3 WHEREAS, counsel for Plaintiffs and the John Bae Defendants request that discovery and
4 dispositive motion dates be extended to provide them with adequate time to conduct initial
5 disclosures, informally exchange information and documents to support settlement negotiations, and
6 to conduct discovery;

7 WHEREAS, Plaintiffs and the Joon Sik Bae Defendants have agreed to continue their
8 informal exchange of information and documents to support their ongoing settlement negotiations;

9 NOW, THEREFORE, by and through their counsel, the undersigned Parties hereby
10 stipulate and request the Court to order as follows:

11 1. Discovery and dispositive motion deadlines shall be extended, with the new
12 deadlines to be as follows:

13 Disclosure of witnesses (case in chief): December 17, 2010

14 Fact discovery cut-off: February 28, 2011

15 Expert disclosure: February 28, 2011

16 Rebuttal expert reports due: March 14, 2011

17 Expert discovery cut-off: April 15, 2011

18 Dispositive motions hearing: June 6, 2011

19 2. The stipulation to stay discovery entered into by Plaintiffs, the Sukmin Bae
20 Defendants and the Joon Sik Bae Defendants shall now include the John Bae Defendants and
21 shall continue until the date that Plaintiffs and each of the Defendants stipulate that their
22 settlement negotiation and/or mediation process is completed, or November 15, 2010,
23 whichever occurs first.

24 IT IS SO STIPULATED.

25
26 OWEN, WICKERSHAM & ERICKSON, P.C.

1 Date: September 9, 2010

By: /s/ Noel M. Cook
NOEL M. COOK
LINDA JOY KATTWINKEL
Attorneys for Plaintiffs
SANRIO COMPANY, LTD., and SANRIO, INC.

5 BLEDSON, CATHCART, DIESTEL,
6 PEDERSEN & TREPPA, LLP

7 Date: September 9, 2010

By: /s/ L. Jay Pedersen
L. JAY PEDERSEN
JOSHUA N. ROSEN
Attorneys for Defendant
ACCESSITIVE ACCESSORIES, INC.

11 TINGLEY PIONTKOWSKI LLP

12 Date: September 9, 2010

By: /s/ Bruce Pointkowski
BRUCE C. POINTKOWSKI
JONATHAN A. MCMAHON
Attorney for Defendants
J.I.K. ACCESSORIES, INC.
ACCESSITIVE ACCESSORIES, INC.
B.B. APPARELS INC.
AMUSECO ACCESSORIES, INC.
JOON SIK BAE, ANDY BAE, and BRIAN BAE

18 S. CALVIN MYUNG

19 Date: September 9, 2010

By: /s/ S. Calvin Myung
S. CALVIN MYUNG
Attorney for Defendants
SUKMIN BAE, AND HYANG HEE BAE,
DBA BLISS AND FINAL CHOICE

23 LEACH AND MCGREEVY

24 Date: September 9, 2010

By: /s/ Richard E. McGreevy
RICHARD E. MCGREEVY
BRIAN LEACH
Attorney for Defendants
JOHN BAE AND AERON BAE,

DBA BLISS AND FINAL CHOICE

IT IS SO ORDERED

Dated: 9/10, 2010.

MARILYN H. PATEL
U.S. DISTRICT JUDGE

